

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and
RICHARD ELVIN KING, individually
and on behalf of those similarly situated,

Plaintiffs,

V.

BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE,

Defendants.

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Case No.: 4:20-cv-01115

Hon. Keith P. Ellison

PLAINTIFFS' AMENDED TRIAL EXHIBIT LIST¹

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
1.		TDCJ Pack Unit Directory					
2.		TDCJ Pack Unit Diagrams (ECF No. 922-9, <i>Cole v. Collier</i>)					
3.		Prevent the Spread of COVID-19 (Poster)	VALENTINE 1634				
4.		Video – Communicable Disease Final Cut	VALENTINE 3063				
5.		Video – Collier Address – Coronavirus 1- Facebook	VALENTINE 3062				
6.		Exhibit Withdrawn					

¹ These exhibit designations do not include rebuttal exhibits to Plaintiff's exhibits or witnesses.

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
7A.	06/15/2020 – 06/22/2020	Pack Unit Master Assignment Roster	VALENTINE 10980 - 11024				
7B.	06/01/2020 – 06/08/2020	Pack Unit Master Assignment Roster	VALENTINE 11025 - 11071				
7C.	06/29/2020	Pack Unit Master Assignment Roster	VALENTINE 11538 - 11560				
8.		Dr. Linthicum Job Duties During COVID-19 Pandemic					
9.	07/08/2015 - 12/10/2015	BP-03.77 (rev. 9), Offender Grievances; AD-03.82 (rev. 8), Management of Offender Grievances (Collier Dep. Ex. 1)	VALENTINE 0342 – 0352				
10.	02/2017	TDCJ Offender Orientation Handbook	VALENTINE 0195 – 0341				
11.	01/09/2020	TDCJ – P1 Job Turnout by Job and House	VALENTINE 6993 – 6994				
12.	02/26/2020	Emails re UTMB CMC Calls a Coronavirus Planning and response Meeting	VALENTINE 2645 – 2646				
13.	02/28/2020	Email re Guidance Documents from TDEM and DSHS					
14.	03/09/2020 – 05/01/2020	DSHS Daily Briefing					
15.	03/11/2020	Action Items From the March 11 Pandemic Flu Plan Meeting – Directive from the Executive Director’s Office	VALENTINE 2665 – 2667				
16.		Exhibit Withdrawn					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
17.	03/12/2020	Email re Media Services Request for Video Demonstrating Proper Donning and Doffing of PPE					
18.	03/17/2020	Letter to the Governor's Office Requesting a Waiver of the Health Care Services Fee					
19.	03/20/2020	Email re: Governor Suspends Health Care Services Fee					
20.	03/20/2020	Email re Guidelines for Cleaning & Disinfecting Vehicles					
21.	03/20/2020	Email from A. Hill to J. Clark; Subj: RE: Health Care Fee Waiver	VALENTINE 2403 – 2405				
22.	03/20/2020	TDCJ Pandemic Viral Infectious Disease Policy for COVID-19	VALENTINE 2770 – 2790				
23.	03/21/2020	Email re Request for Meetings with CID About PPE for Correctional Officers and to Discuss SOP for Transport Officers					
24.	03/21/2020	Email re TDCJ and CMHC PPE Supplies					
25.	03/25/2020	Emails re Advocacy Efforts to Include TDCJ Offenders in COVID-19 Clinical Trials at UTMB Galveston					
26.	03/26/2020	Worked on Letter to Texas State Jail Commission with TDCJ Chief of Staff Requesting Screening of Offenders for COVID-19 <u>Prior</u> to Transport to TDCJ					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
27.	03/28/2020	Email re Meeting with RID and CID to Review Releasing Procedures for COVID-19 Offenders					
28.	03/28/2020	Email from P. Keiser to L. Linthicum; Subj: HG Covid-19 exposures	VALENTINE 3251 – 3253				
29.	03/31/2020	Email re Sheltered Housing Unit (SHU) and Assisted Living Bed Counts	VALENTINE 3283 - 3286				
30.	03/31/2020	TDCJ - Dr. Linthicum COVID-19 Update on Facebook					
31.	04/2020	Emails re COVID-19 Surveillance Testing UTMB					
32.	04/01/2020	Email re Hand Sanitizer Guidance					
33.	04/01/2020	Medical Intervention at TDCJ					
34.	04/07/2019 – 04/09/2020	Emails re Various Meetings with Elected Officials					
35.	04/08/2020	TDCJ letter re Governor Waiver of Intake	VALENTINE 2406 – 2408				
36.	04/09/2020	Email re Establishment of COVID-19 Family Hotlines					
37.	04/10/2020	TDCJ Medical Action Center Updates					
38.	04/11/2020	TDCJ Medical Action Center Updates					
39.	04/12/2020	Email from C. Monroe; Subj: Fwd: Limited Activities Plan – P1	VALENTINE 5884 – 5887				
40.	04/13/2020	TDCJ Medical Action Center Updates					
41.	04/14/2020	TDCJ COVID-19 Update (ECF No. 29-1)					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
42.	04/15/2020	TDCJ Medical Action Center Updates					
43.	04/15/2020	Email from M. Steele to B. Hirsch; Subj: Updated Timeline (Clerkly)	VALENTINE 9665 – 9666				
44.	04/16/2020	TDCJ Medical Action Center Updates					
45.	04/17/2020	Letter re County Judge Matt Sebesta addresses State Inmate Transfer					
46.	04/17/2020	TDCJ Medical Action Center Updates					
47.	04/18/2020	TDCJ Medical Action Center Updates					
48.	04/20/2020	TDCJ Medical Action Center Updates					
49.	04/20/2020	Email from M. Steele to C. Monroe; Subj: Housing Plan	VALENTINE 5811 – 5812				
50.	04/22/2020	TDCJ Medical Action Center Updates					
51.	04/23/2020	TDCJ Medical Action Center Updates					
52.	04/24/2020	TDCJ Medical Action Center Updates					
53.	04/25/2020	TDCJ Medical Action Center Updates					
54.	04/28/2020	TDCJ Medical Action Center Updates					
55.	04/29/2020	TDCJ Medical Action Center Updates					
56.	05/01/2020	TDCJ Medical Action Center Updates					
57.	05/02/2020	TDCJ Medical Action Center Updates					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
58.	05/03/2020	TDCJ Correctional Institutions Division Inter-Office Communication re Drinking Water					
59.	05/04/2020	TDCJ Medical Action Center Updates					
60.	05/06/2020	TDCJ Medical Action Center Updates					
61.	05/07/2020	TDCJ Medical Action Center Updates					
62.	05/08/2020	TDCJ Medical Action Center Updates					
63.	05/09/2020	TDCJ Medical Action Center Updates					
64.	05/11/2020	K. Hawkins, Solicitor General's letter to Fifth Circuit Court of Appeals					
65.	05/11/2020	TDCJ COVID-19 Medical Action Center					
66.		Withdrawn					
67.	05/12/2020	TDCJ News: TDCJ deploying significant testing of asymptomatic population					
68.	05/13/2020	TDCJ Medical Action Center Updates					
69.	05/13/2020	TDCJ Past Medical Action Center Updates					
70.	05/14/2020	TDCJ Medical Action Center Updates					
71.	05/15/2020	TDCJ COVID-19 Medical Action Center					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
72.	05/15/2020	Notes from Conference Call May 15, 2020, TDCJ and TIFA					
73.		Withdrawn					
74.	05/16/2020	TDCJ Medical Action Center Updates					
75.	05/24/2020	Aff. of P. Wilder with “20% positive COVID-19 Plan Revision 2”	VALENTINE 3068 – 3071				
76.	05/27/2020	TDCJ’s Status Report – Update on Wallace Pack Unit Response to COVID-19 (ECF-126-1) (Mendoza Dep. Ex. 5)					
77.	06/01/2020	Defendants Supplemental Response to Plaintiffs’ Second Set of Interrogatories, Interrogatory No. 5	VALENTINE 2446 – 2458				
78.	03/21/2020	Email re COVID 19 PPE Rooming Procedures	VALENTINE 3042 - 3043				
79.	06/08/2020	Defendants Supplemental Response to Plaintiffs’ Second Set of Interrogatories, Interrogatory No. 7	VALENTINE 2555 – 2559				
80.	06/12/2020	Email from B. Hirsch to C. Monroe and others; Subj: COVID PPE Guidelines.docx	VALENTINE 5937 – 5942				
81.	06/12/2020	Email from M. Steele to B. Hirsch; Subj: Medical Restriction	VALENTINE 5972 – 5974				
82.	09/2014	TDCJ Administrative Review & Risk Management – Offender Grievance Operations Manual	VALENTINE 0353 – 0480				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
83.	Various Dates	Emails re CMHC Policy Changes					
84.	Various Dates	Dr. Keiser Consultation Reports					
85.		Oscar Mendoza Handwritten Notes (Mendoza Dep. Ex. 2)					
86.	Most recent available	CDC – Testing Data in the U.S.	https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/testing-in-us.html				
87.	Most recent available	CDC – Daily Updates of Totals by Week and State	https://www.cdc.gov/nchs/nvss/vsrr/covid19/index.htm				
88.	03/23/2020	Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities (Herrera Dep. Ex. 2)					
89.	03/30/2020	CDC Guidance on Management of COVID-19 in Correctional and Detention Facilities					
90.	04/01/2020	CDC Coronavirus Disease 2019 (COVID-19) – Cleaning and Disinfection for Community Facilities					
91.	04/09/2020	CDC FAQs for Administrators at Correctional and Detention Facilities					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
92.	04/13/2020	CDC – Resources for Correctional and Detention Facilities	https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/index.html				
93.	04/17/2020	CDC – Groups at Higher Risk for severe Illness (ECF No. 58-6)					
94.	04/24/2020	CDC Coronavirus Disease 2019 (COVID-19) – How to Protect Yourself & Others					
95.		Exhibit Withdrawn					
96.	05/07/2020	Coronavirus Disease 2019 (COVID-19) – Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities					
97.	05/12/2020	CDC – Clinical Questions about COVID-19: Questions and Answers	https://www.cdc.gov/coronavirus/2019-ncov/hcp/faq.html				
98.	05/19/2020	CDC – Performing Facility-wide SARS-CoV-2 Testing in Nursing Homes	https://www.cdc.gov/coronavirus/2019-ncov/hcp/nursing-homes-facility-wide-testing.html				
99.	06/13/2020	CDC – Testing Guidelines for Nursing Homes	https://www.cdc.gov/coronavirus/2019-ncov/hcp/nursing-homes-testing.html				
100.		Withdrawn					

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101.	06/25/2020	CDC – Preparing for COVID-19 in Nursing Homes	https://www.cdc.gov/coronavirus/2019-ncov/hcp/long-term-care.html				
102.	07/02/2020	CDC – Overview of Testing for SARS-CoV-2	https://www.cdc.gov/coronavirus/2019-ncov/hcp/testing-overview.html				
103.	10/2018	B-14.51 – Influenza-Like Illness (ILI)					
104.	02/2019	B-14.01 – Infection Control Program					
105.	02/2019	B-14.02 – Correctional Managed Health Care Infection Control Committee					
106.	02/2019	B-14.05 Occupational Exposure Counseling and Testing for TDCJ and Correctional Managed Health Care Employees (With Attachments A-N)					
107.	03/2020	CMHC Infection Control Policy Manual: Table of Contents					
108.	03/20/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 0006 – 0014				
109.	03/27/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 0027 – 0057				

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110.	04/02/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 0058 – 0088				
111.	04/15/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 0089 – 0125				
112.	05/06/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 0652 – 0688				
113.		Exhibit Withdrawn					
114.	05/13/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 0689 – 0727				
115.	6/11/2020	B-14.52 – Policy: To outline management and control measures for facilities to follow in response to the spread of COVID-19	VALENTINE 3409 – 3451				
116.		Exhibit Withdrawn					
117.	07/01/2019	U.S. Census – Quickfacts Texas	https://www.census.gov/quickfacts/TX				
118.	03/16/2020	Declaration of Local Disaster for Public Health Emergency, Grimes County, Texas					

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119.	03/19/2020	Governor Greg Abbott's Executive Order No. GA-08 relating to COVID-19 preparedness and mitigation					
120.	03/23/2020	Extended Declaration of Local Disaster for Public Health Emergency, Grimes County, Texas					
121.	03/25/2020	President Donald J. Trump Approves Texas Disaster Declaration					
122.	03/25/2020	Texas House of Representatives Mitigation Efforts					
123.	03/26/2020	Memorandum from William Barr re Prioritization of Home Confinement as Appropriate in Response to COVID-19 Pandemic					
124.	04/16/2020	Grimes County Office of Emergency Management Press Release – Eighth and Ninth Confirmed Cases of COVID-19 in Grimes County					
125.	05/12/2020	Governor Greg Abbott – Texas Disaster Proclamation					
126.	05/18/2020	Grimes County Emergency Management					
127.	05/18/2020	Texas Case Counts COVID-19 – Brazos County					
128.	05/18/2020	Texas Case Counts COVID-19 – Grimes County					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
129.	05/18/2020	Texas Case Counts COVID-19 – Washington County					
130.		Step 2 Grievance of Laddy Valentine	VALENTINE 3072 – 3083				
131.		Most recent COVID-19 Grievances and any responses	Compilation				
132.	03/26/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 03/25/20	VALENTINE 6205 – 6207 ²				
133.	04/01/2020	TDCJ Step 1 Offender Grievance Form – Laddy Valentine	VALENTINE 0637 – 0644				
134.	04/02/2020	TDCJ Step 1 Offender Grievance Form – Laddy Valentine	VALENTINE 0645 – 0650				
135.	04/02/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/01/20	VALENTINE 6147 – 6148				
136.	04/03/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/02/20	VALENTINE 6071 – 6073				
137.	04/06/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/03/20	VALENTINE 10223 – 10225				
138.	04/07/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/06/20	VALENTINE 9869 – 9872				
139.	04/08/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/07/20	VALENTINE 10159 – 10163				

² Due to errors in TDCJ's image production, Plaintiffs expect they may submit printouts of the text production of exhibits 206 through 223.

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
140.	04/09/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/08/20	VALENTINE 5869 – 5872				
141.	04/09/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/10/20	VALENTINE 9857 – 9860				
142.	04/13/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/10/20	VALENTINE 10246 – 10248				
143.	04/15/2020	Affidavit of Frances Gattis re Grievances of Laddy Valentine	VALENTINE 0193 – 0194				
144.	04/16/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/15/20	VALENTINE 9730 – 9734				
145.	04/16/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/14/20	VALENTINE 9739 – 9743				
146.	04/20/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/17/20	VALENTINE 9464 – 9466				
147.	04/21/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/20/20	VALENTINE 9355 – 9360				
148.	04/23/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/22/20	VALENTINE 9154 – 9159				
149.	04/24/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/23/20	VALENTINE 9120 – 9127				
150.	04/27/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/24/20	VALENTINE 5750 – 5754				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
151.	03/31/2018 – 04/28/2020	Grievances Filed at Pack Unit	VALENTINE 3096 – 3186				
152.	04/28/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 04/27/20	VALENTINE 8754 – 8761				
153.	05/11/2020	TDCJ Step 1 Offender Grievance Form - Laddy C. Valentine (Collier Dep. Ex. 3)	VALENTINE 0638 – 0644				
154.	05/11/2020	Email from F. Gattis to L. Davis et al.; Subj: COVID-19 Grievances through 05/08/20	VALENTINE 8417 – 8420				
155.	05/12/2020	TDCJ Step 1 Offender Grievance Form – Richard King	VALENTINE 2273 – 2277				
155 A	06/30/2020	TDCJ Step 2 Offender Grievance Form – Richard King	VALENTINE 11533 – 11537				
156.		Exhibit Withdrawn					
157.	05/26/2020	Email from J. Riley to D. Davis and others; Subj: COVID-19 Related Grievance Instructions	VALENTINE 2441 - 2445				
158.	05/26/2020	Administrative Incident Review re Daniel Thompson	VALENTINE 1605 – 1633				
159.	06/02/2020	Brooks Provisional Autopsy	VALENTINE 2560 – 2561				
160.	04/14/2020	Clerkly Provisional Autopsy	VALENTINE 2562 – 2564				
161.	Various Dates	COVID-19 Offender Source Contact Tracing (Herrera Dep. Ex. 3)	VALENTINE 1636 – 1673				
162.	03/28/2020	Laddy Valentine I-60	VALENTINE 2271 – 2272				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
163.	06/06/2020	Hart Death Notification	VALENTINE 3206 – 3208				
164.	06/05/2020	Hernandez Death Notification	VALENTINE 3209 – 3211				
165.	06/01/2020	Lacy Provisional Autopsy	VALENTINE 2565 – 2566				
166.		List of Autopsies Performed	VALENTINE 2571				
167.	Various	Most recent Pack Unit administrative reviews of deaths relating to COVID-19	Compilation				
168.		Most recent Pack Unit COVID-19 test results					
169.		Most recent Pack Unit records of hospitalizations relating to COVID-19					
170.		Pack Inmate Testing Results	VALENTINE 1319 – 1324				
171.	05/14/2020	Pack Unit Rosters April 2020	VALENTINE 1428 – 1524				
172.	05/04/2020	Pack Unit Roster May 2020	VALENTINE 1525 – 1573				
173.	05/12/2020	Provisional Autopsy of Daniel Thommpson	VALENTINE 2567 – 2568				
174.		Exhibit Withdrawn					
175.	05/28/2020	Provisional Autopsy of David Uhrich	VALENTINE 2569 – 2570				
176.		Exhibit Withdrawn					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
177.	04/12/2020	Robertston Admin Review	VALENTINE 3187 – 3205				
178.	06/04/2020	Sprague Death Notification	VALENTINE 3212 – 3213				
179.	Most recent available	TDCJ COVID-19 Case Counts	https://txdps.maps.arcgis.com/apps/opsdashboard/index.html#/dce4d7da662945178ad5fbf3981fa35c				
180.	Most recent available	TDCJ Presumed COVID-19 Offender Deaths	https://www.tdcj.texas.gov/covid-19/presumed.html				
181.	01/01/2020 – 04/11/2020	Medical Records of Leonard Clerkly	VALENTINE 1716 – 2084				
182.	01/01/2020 – 04/11/2020	UTMB Medical Records for Leonard Clerkly	VALENTINE 2085 – 2158				
183.	01/01/2020 – 04/30/2020	Medical Records of Laddy Valentine	VALENTINE 2174 – 2205				
184.	01/01/2020 – 04/30/2020	Medical Records of Richard King	VALENTINE 2209 – 2267				
185.	03/01/2020 – 06/01/2020	Coronavirus Lab Results (All Patients Active & Inactive)	VALENTINE 2506 – 2554				
186.	04/03/2020	Contact Tracing Log – Clerkly	VALENTINE 10599				
187.	04/03/2020	Contact Tracing Log – Thompson	VALENTINE 10594				
188.	04/12/2020	TDCJ Memo re Offender Death re James Robertson	VALENTINE 3187 – 3192				
189.	04/18/2020	TDCJ Memo re Offender Death re Clerkly	VALENTINE 0728 – 0767				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
190.		Exhibit Withdrawn					
191.	05/01/2020 – 05/22/2020	Medical Records of Laddy Valentine	VALENTINE 2206 – 2208				
192.	05/01/2020 – 05/27/2020	Medical Records of Laddy Valentine	VALENTINE 2388 – 2402				
193.	05/01/2020 – 05/22/2020	Medical Records of Richard King	VALENTINE 2268 – 2270				
194.	05/01/2020 – 05/27/2020	Medical Records of Richard King	VALENTINE 2409 – 2437				
195.	05/03/2020	TDCJ Memo re Offender Death (Alvis Norris) (Herrera Dep. Ex. 7)	VALENTINE 01576 – 1604				
196.	05/07/2020	Provisional Autopsy of Alvis Norris	VALENTINE 2438 – 2439				
197.		Exhibit Withdrawn					
198.	05/11/2020	Contact Tracing Log – Fountain	VALENTINE 10542				
199.	05/11/2020	Contact Tracing Log – Healy	VALENTINE 10543				
200.	05/12/2020	Contact Tracing Log – Flores	VALENTINE 10541				
201.	05/12/2020	Contact Tracing Log – Straubing	VALENTINE 10544				
202.	05/13/2020	Contact Tracing Log – Brooks	VALENTINE 10552				
203.	05/13/2020	Contact Tracing Log – Casique	VALENTINE 10553				
204.	05/13/2020	Contact Tracing Log – Elmer	VALENTINE 10554				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
205.	05/13/2020	Contact Tracing Log – Gocha	VALENTINE 10489				
206.		Exhibit Withdrawn					
207.	05/16/2020	Contact Tracing Log – Gonzales	VALENTINE 10496				
208.	05/16/2020	Contact Tracing Log – Jefferson	VALENTINE 10498				
209.	05/16/2020	Contact Tracing Log – Kinhult	VALENTINE 10499				
210.	05/16/2020	Contact Tracing Log – McHald	VALENTINE 10502				
211.	05/16/2020	Contact Tracing Log – Samuel	VALENTINE 10507				
212.	05/16/2020	Contact Tracing Log – Sanchez	VALENTINE 10508				
213.	05/16/2020	Contact Tracing Log – Vega	VALENTINE 10510				
214.	05/18/2020	Contact Tracing Log – Higgins	VALENTINE 10479				
215.	05/19/2020	Pack Unit Housing List	VALENTINE 1674 – 1685				
216.	5/26/2020	Pack Unit May Updated Roster	VALENTINE 2459 – 2505				
217.		Exhibit Withdrawn					
218.		Exhibit Withdrawn					
219.		Exhibit Withdrawn					

Ex.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
220.	07/07/2020	Rebuttal Report of Jeremy D. Young, MD, MPH					
220 A		Curriculum Vitae of Jeremy D. Young, MD, MPH					
221.	03/30/2020	Declaration of Jeremy D. Young, MD, MPH (ECF Mo. 12)					
222.	04/01/2020	Declaration of Robert L. Cohen, M.D. (ECF No. 13)					
222 A		Curriculum Vitae of Robert L. Cohen, MD					
223.	04/01/2020	Report of Eldon Vail (ECF No. 14)					
223 A		Curriculum Vitae of Eldon Vail					
224.	04/02/2020	Declaration of Joseph Gathe, MD					
225.		Exhibit Withdrawn					
226.	04/15/2020	Declaration of Robert Herrera (Herrera Dep. Ex. 6)	VALENTINE 0160 – 0192				
227.	04/15/2020	Declaration of Laddy Valentine (ECF No. 31)					
228.	04/15/2020	Declaration of Richard King (ECF No. 32)					
229.	04/15/2020	Declaration of Robert Herrera	VALENTINE 0768 – 0800				
230.	06/20/2020	Amended Report of Eldon Vail					
231.	06/23/2020	Supplemental Declaration of Jeremy D. Young, MD, MPH					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
232.	06/26/2020	Supplemental Declaration of Robert L. Cohen, M.D.					
233.	1997	Voss A, Widmer AF. No time for handwashing? Handwashing versus alcoholic rub: can we afford 100% compliance?	VALENTINE-YOUNG 00087 - 00091				
234.	2005	Gordin FM, Schultz ME, Huber RA, Gill JA. Reduction in nosocomial transmission of drug-resistant bacteria after introduction of alcohol-based handrub	VALENTINE-YOUNG 00059 - 00063				
235.	2000	Pittet D, Hugonnet S, Harbarth S, et al. Effectiveness of a hospital-wide programme to improve compliance with hand hygiene	VALENTINE-YOUNG 00053 - 00058				
236.	2020	Chu DKW, Pan Y, Cheng SMS, et al. Molecular diagnosis of a novel coronavirus (2019-nCoV) causing an outbreak of pneumonia	VALENTINE-YOUNG 00072 - 00078				
236 A.	04/2020 – 05/2020	Njuguna H, Wallace M, Simonson S, et al. Serial laboratory testing for SARS-CoV-2 infection among incarcerated and detained persons in a correctional and detention facility – Louisiana	VALENTINE-YOUNG 00065 - 00071				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
237.	03/10/2020	Nearly 100 prison inmates in NY to produce 100K gallons of hand sanitizer weekly					
238.	03/21/2020	Grimes County's second confirmed COVID-19 case is a close contact of first patient					
239.	03/23/2020	Substance abuse counselor who visited inmates at Richmond prison tests positive for coronavirus, officials announce (News article)					
240.	03/24/2020	Coronavirus hits Texas prisons with first inmate case confirmed					
241.	03/25/2020	Washington County: 101 out of 146 positive cases of COVID-19 linked to one nursing home					
242.	03/28/2020	Prisoners At Rikers Say It's Like a 'Death Sentence' As Coronavirus Spreads					
243.	03/28/2020	Coronavirus In Chicago: 89 Inmates, 12 Staff At Cook County Jail Test Positive For COVID-19					
244.	03/28/2020	Sheriff announces 51 new coronavirus cases at Cook County Jail, raising total to 89					
245.	03/28/2020	Prisoner serving time for drug charge is first U.S. inmate to die from COVID-19					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
246.	03/29/2020	An explosion of coronavirus case cripples a federal prison in Louisiana					
247.	03/30/2020	Estimates of the severity of coronavirus disease 2019: a model-based analysis, (www.thelancet.com/infection) (ECF No. 58-7)					
248.	03/30/2020	Coronavirus in Greater Houston: Live Updates					
249.	03/30/2020	First COVID-19 cases confirmed in Minnesota's prison system					
250.	03/30/2020	Stateville Inmate Dies, Several Others on Ventilators After Testing Positive for Coronavirus					
251.	03/30/2020	Keri Blakinger (@keribla) Tweet					
252.	04/16/2020	Grimes County confirm another COVID-19 case at Pack Unit (ECF No. 58-2)					
253.	04/20/2020	See Which States and Cities Have Told Residents to Stay at Home					
254.	04/22/2020	Deaths of two longtime TDCJ employees linked to coronavirus					
255.	04/23/2020	Texas Prison Employees Die After Testing Positive for Coronavirus					
256.	04/29/2020	TDCJ: Correction officer at Abilene Middleton Unit dies of COVID-19					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
257.	05/09/2020	2 Texas correctional officers die from possible COVID-19 complications					
258.	05/09/2020	Two more Texas Department of Criminal Justice employees may have died due to COVID-19					
259.	05/11/2020	Texas prison COVID-19 death toll continues to rise					
260.	05/12/2020	Texas expanding COVID-19 testing in prisons					
261.	05/12/2020	Texas prisons to begin widespread coronavirus testing for inmates with self-administered tests					
262.	05/12/2020	Texas prisons will implement widespread coronavirus testing procedure					
263.	05/12/2020	TDCJ: Ten of thousands of COVID-19 tests to be deployed to state prisons					
264.	05/13/2020	Coronavirus in Texas – May 13					
265.	5/13/2020	Texas Ramps up COVID-19 Testing at State Prisons					
266.	05/14/2020	Texas testing all inmates for COVID-19; strike team deployed to Grimes County's Pack Unit					
267.	07/07/2020	CDC Interim Consideration for SARS-CoV-2 Testing in Correctional and Detention Facilities					

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
268.		Dr. Jeffrey Beard's Handwritten Notes - TDCJ					
269.	06/03/2020	Dr. Jeffrey Beard Invoice for services provided (May 2020)					
270.	07/01/2020	Dr. Jeffrey Beard Invoice for services provided (June 2020)					
271.	05/29/2020	Dr. Jeffrey Beard's Handwritten Notes – TDCJ Tour					
272.	05/15/2020	Email from J. Riley to L. Davis and others; Subj: COVID-19 Grievances 05/14/2020	VALENTINE 35379 – 35381				
273.	05/19/2020	Email from J. Riley to L. Davis and others; Subj: RE: COVID-19 Grievances 5/18/2020	VALENTINE 35373 – 35378				
274.	05/22/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 05/21/2020	VALENTINE 35363 – 35365				
275.	05/28/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 05/26/2020	VALENTINE 35341 – 35346				
276.	05/29/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 05/28/2020	VALENTINE 35335 – 35340				
277.	06/01/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 05/29/2020	VALENTINE 33673 – 33678				
278.	06/03/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/01/2020	VALENTINE 32034 – 32042				
279.	06/03/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/02/2020	VALENTINE 35321 – 35328				

EX.	DATE	DESCRIPTION	REFERENCE	OFFER	OBJ.	ADMIT	N/ ADM
280.	06/04/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/03/2020	VALENTINE 33518 – 33522				
281.	06/05/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/04/2020	VALENTINE 35382 – 35385				
282.	06/09/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/08/2020	VALENTINE 35354 – 35362				
283.	06/10/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/09/2020	VALENTINE 35315 – 35320				
284.	06/11/2020	Email from J. Riley to L. Davis and others; Subj: COVID-10 Grievances 06/10/2020	VALENTINE 35309 – 35314				
285.		Accelerated Emergency Use Authorization (EUA) Summary Curative-Korva SARS- COV-2 ASSAY					
286.	05/21/2020	K. Hawkins, Solicitor General's letter to Fifth Circuit Court of Appeals					
287.	05/28/2020	K. Hawkins, Solicitor General's letter to Fifth Circuit Court of Appeals					

Plaintiffs reserve the right to use any exhibits identified by Defendants as potential exhibits. Plaintiffs' additionally reserve the right to use any filing or statement at a hearing made by Defendants, demonstrative exhibits, all deposition testimony, including deposition designation excerpts, and exhibits for impeachment and rebuttal, which do not specifically appear on the exhibit list at trial.

Dated: July 12, 2020.

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record on July 12, 2020.

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